

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:)	Case No. 17-04034
)	
JASON LEWIS ZILBERBRAND,)	Chapter 7
)	
Debtor,)	Honorable A. Benjamin Goldgar
)	
ILENE F. GOLDSTEIN, not individually,)	Lake County
but as chapter 7 Trustee for the Estate of)	
Jason Lewis Zilberbrand,)	
)	
Plaintiff,)	
)	
v.)	Adv No. 19-ap-00129
)	
JASON LEWIS ZILBERBRAND,)	
)	
Defendant.)	

NOTICE OF MOTION

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on May 24, 2019 at 1:30 p.m., we will appear before the Honorable A. Benjamin Goldgar or such other Judge as may be presiding in his stead, in the Park City Branch Court, 301 S. Greenleaf Avenue, Park City, Illinois 60085, in Courtroom B, and present our **Motion To Extend Time To Answer Or Otherwise Plead**, a copy of which is attached hereto and served upon you herewith.

By: /s/Jeffrey C. Dan
Crane, Simon, Clar & Dan
135 S. LaSalle, #3705
Chicago, IL 60603
(312) 641-6777

CERTIFICATE OF SERVICE

The undersigned, being first duly sworn on oath deposes and states that he caused a copy of the foregoing Notice and attached Motion to be served electronically through the Court's Electronic Registration on all parties listed on the attached Service List, on the 2nd day of May, 2019.

/s/Jeffrey C. Dan

SERVICE LIST

Ilene F. Goldstein
c/o Paul M. Bauch
Lakelaw
53 W. Jackson St., #1115
Chicago, IL 60604
pbauch@lakelaw.com

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Defendant.)	

MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD

JASON ZILBERBRAND, Defendant herein, by and through his attorneys, for his Motion to Extend Time to Answer or Otherwise Plead, hereby states as follows:

1. On March 12, 2019, the Trustee, Ilene F. Goldstein, filed her Complaint to Revoke Discharge.
2. The Defendant has recently retained counsel who is in the process of preparing a motion to dismiss.
3. By this Motion, the Defendant requests an extension through and including May 24, 2019, to file the motion to dismiss this adversary case.
4. There is no prejudice to the Trustee by allowing the Defendant an extension of time to file his motion to dismiss.

WHEREFORE, JASON ZILBERBRAND, Defendant herein, respectfully requests this Court enter an Order granting the Defendant through and including May 24, 2019 to file his Motion to Dismiss and for such other and further relief as this Court deems just and appropriate.

Respectfully submitted,

JASON LEWIS ZILBERBRAND

By: /s/Jeffrey C. Dan
One of His Attorneys

DEBTOR/DEFENDANT'S COUNSEL:

Jeffrey C. Dan
(Atty. No. 06242750)
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